

Exhibit C-2

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

ECOFACITOR, INC.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 6:20-cv-00075 (ADA)

DEFENDANT GOOGLE LLC'S DEPOSITION DESIGNATIONS

Pursuant to the Court's procedures and Scheduling Order, Defendant Google LLC ("Google") hereby discloses its initial deposition designations, attached hereto as Attachment A. Google's initial designations are based on the arguments it expects to make in support of issues where Google bears the burden of persuasion (e.g., affirmative defenses), as well as Google's understanding of the evidence and arguments that Plaintiff is likely to present on the issues where Plaintiff bears the burden of persuasion. Google reserves the right to make additional designations that are responsive to those submitted by Plaintiff, including both separate designations responsive to those submitted by Plaintiff as well as supplemental designations necessary for completeness of those submitted by Plaintiff. To the extent that Plaintiff intends or attempts to rely on evidence and/or to make different or additional arguments from those timely disclosed by Plaintiff, Google may further supplement or amend its deposition designations or move to strike the designations submitted by Plaintiff. Additionally, Google's initial designations are based on the current status of the case, including the witness list Plaintiff has disclosed. Google expressly reserves the right to amend or supplement these designations if circumstances change and Plaintiff indicates it no longer intends to call a particular witness or its witness list changes in another way.

Google reserves the right to supplement, amend, or withdraw designations in light of any future rulings by the Court or other evidentiary objections raised by the parties prior to trial. Further, these deposition designations are made subject to Google's objections to Plaintiff's attempt to introduce certain evidence, including as set forth in Google's motions *in limine*. Google's inclusion of certain deposition designations does not waive and is explicitly subject to Google's objections to the admission of certain related evidence and constitutes a reservation of rights to present the designated testimony at trial if Google's motions *in limine* are

not granted. In addition, Google's inclusion of any deposition designation is not an admission that the testimony is relevant or admissible for all purposes or under any circumstances, nor is it an admission that it would be admissible if offered by Plaintiff. Google reserves all rights to object to Plaintiff's use of any deposition testimony listed herein.

Google's initial designations do not constitute or reflect any commitment that Google will present deposition testimony at trial from any particular witness or that it will present the entirety of its initial designations for any witness. Google's initial designations also do not constitute or reflect a waiver of any evidentiary objection or an admission by Google that any particular testimony by any witness should be admitted at trial.

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Respectfully submitted,

KEKER, VAN NEST & PETERS LLP

Dated: December 15, 2021

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 15, 2021, the foregoing was served on all counsel of record by e-mail.

/s/Jennifer A. Huber
Jennifer A. Huber

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

ECOFACOR, INC.

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 6:20-cv-00075-ADA

**ECOFACOR'S OBJECTIONS TO GOOGLE'S DEPOSITION DESIGNATIONS AND
ECOFACOR'S COUNTER DESIGNATIONS**

Pursuant to the Court's procedures and Scheduling Order, Plaintiff EcoFactor, Inc. ("EcoFactor") hereby discloses its counter-designations to Defendant Google LLC's ("Google") initial deposition designations, attached hereto as Exhibit A.

EcoFactor also objects to Google's deposition designations under Federal Rule of Civil Procedure 32(a) to the deposition testimony of Glen Okita because he testified as corporate designee on behalf of EcoFactor and is available to testify at trial. Accordingly, the Court should allow Mr. Okita to testify at trial to matters within the corporate knowledge to which he testified in deposition in lieu of allowing the reading or playing into evidence his Rule 30(b)(6) deposition testimony. *See, e.g., Jackson v. Chevron Chem. Co.*, 679 F.2d 463 (5th Cir. 1982) (rejecting argument that district court erred in refusing to admit deposition testimony of witness who was present at trial); *Gonzalez Prod. Sys., Inc. v. Martinrea Int'l Inc.*, 310 F.R.D. 341, 344 (E.D. Mich. 2015) (concluding that "Rule 32(a)(3) precludes an opposing party from presenting the deposition of a party or its agent at trial as opposed to calling such individual to provide direct testimony"). Allowing Google to introduce EcoFactor's witness's Rule 30(b)(6) testimony through deposition would "undermine the general 'preference for live testimony' and the 'importance of cross-examination'" and would "undermine th[e] Court's ability to efficiently run [the] trial." *Id.* (quoting *White v. Illinois*, 502 U.S. 346, 356 (1992)).

EcoFactor's counter-designations are made for purposes of completion or to address issues raised for the first time by Google's deposition designations. EcoFactor reserves the right to make additional counter-designations that are responsive to any supplemental designations submitted by Google, including both separate designations responsive to those submitted by Google as well as supplemental designations necessary for completeness of those submitted by Google. To the extent that Google intends or attempts to rely on evidence and/or to make

different or additional arguments from those timely disclosed by Google, EcoFactor may further supplement or amend its counter-designations and objections or move to strike the designations submitted by Google. Additionally, EcoFactor's counter-designations and objections are based on the current status of the case, including the witness list Google has disclosed.

EcoFactor reserves the right to supplement, amend, or withdraw counter-designations and objections in light of any future rulings by the Court or other evidentiary objections raised by the parties prior to trial. Further, these counter-designations are made subject to EcoFactor's objections to Google's attempt to introduce certain evidence, including as set forth in EcoFactor's motions *in limine*. EcoFactor's inclusion of certain counter-designations does not waive and is explicitly subject to EcoFactor's objections to the admission of certain related evidence and constitutes a reservation of rights to present the designated testimony at trial if EcoFactor's motions *in limine* are not granted. In addition, EcoFactor's inclusion of any counter-designation is not an admission that the testimony is relevant or admissible for all purposes or under any circumstances, nor is it an admission that it would be admissible if offered by Google. EcoFactor reserves all rights to object to Google's use of any deposition testimony listed herein.

EcoFactor's counter-designations do not constitute or reflect any commitment that EcoFactor will present deposition testimony at trial from any particular witness or that it will present the entirety of its counter-designations for any witness. EcoFactor's counter-designations and objections also do not constitute or reflect a waiver of any evidentiary objection or an admission by EcoFactor that any particular testimony by any witness should be admitted at trial.

Date: December 22, 2021

Respectfully submitted,

/s/ Reza Mirzaie

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CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendant on December 22, 2021 via electronic service.

/s/ Reza Mirzaie

Reza Mirzaie

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

ECOFACOR, INC.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 6:20-cv-00075 (ADA)

**GOOGLE’S OBJECTIONS AND COUNTER-COUNTER-DESIGNATIONS
TO ECOFACTOR’S DEPOSITION COUNTER-DESIGNATIONS**

Pursuant to the Court's procedures and Scheduling Order, Defendant Google LLC ("Google") hereby discloses its objections and counter-counter-designations to Plaintiff EcoFactor, Inc.'s ("EcoFactor") deposition counter-designations, attached hereto as Attachment A.

EcoFactor has not provided counter-designations to Google's designations of the depositions of Michael Brown, Timothy Clark, Adam Grant, Shayan Habib (May 14, 2020, June 19, 2020, September 15, 2021, and September 16, 2021), and so Google has not provided any corresponding objections or counter-counter-designations. To the extent that EcoFactor is later permitted to provide counter-designations, Google reserves the right to lodge objections and make counter-counter-designations to any untimely counter-designations.

Google's counter-counter-designations provided here with its objections are made for purposes of completeness or to address issues raised for the first time by EcoFactor's deposition counter-designations. To the extent that EcoFactor intends or attempts to rely on evidence and/or to make different or additional arguments from those timely disclosed by EcoFactor, Google may further supplement or amend its counter-counter-designations and objections or move to strike the additional counter-designations submitted by EcoFactor. Additionally, Google's counter-counter-designations and objections are based on the current status of the case, including the witness list EcoFactor has disclosed.

Google reserves the right to supplement, amend, or withdraw counter-counter-designations and objections in light of any future rulings by the Court or other evidentiary objections raised by the parties prior to trial. Further, these counter-counter-designations are made subject to Google's objections to EcoFactor's attempt to introduce certain evidence, including as set forth in Google's motions *in limine*. Google's inclusion of certain counter-

counter-designations does not waive and is explicitly subject to Google's objections to the admission of certain related evidence and constitutes a reservation of rights to present the designated testimony at trial if Google's motions *in limine* are not granted. In addition, Google's inclusion of any counter-counter-designation is not an admission that the testimony is relevant or admissible for all purposes or under any circumstances, nor is it an admission that it would be admissible if offered by EcoFactor. Google reserves all rights to object to Plaintiff's use of any deposition testimony listed herein.

Google's counter-counter-designations and objections do not constitute or reflect any commitment that Google will present deposition testimony at trial from any particular witness or that it will present the entirety of its designations for any witness. Google's counter-counter-designations and objections also do not constitute or reflect a waiver of any evidentiary objection or an admission by Google that any particular testimony by any witness should be admitted at trial.

///

Respectfully submitted,

KEKER, VAN NEST & PETERS LLP

Dated: December 29, 2021

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The undersigned hereby certifies that on December 29, 2021, the foregoing was served on all counsel of record by e-mail.

s/Patrick E. Murray
Patrick E. Murray

Attachment A**Google's Objections and Counter-Designations to EcoFactor's Counter-Designations**

Abbreviations	Deposition Objections
R	Relevance (FRE 401)
LF	Lacks foundation
H	Hearsay (FRE 802)
A	Authentication (FRE 901)
403	Rule 403 (unduly prejudicial/inflammatory/confusing/waste of time/misleading)
P	Privileged
C	Rule of Completeness
404(a)	Rule 404(a) (character evidence)
1006	Rule 1006 (summary of voluminous documents)
OR	Original Required (FRE 1002)
MIL/Daubert	Subject to MIL/Daubert
LP	Limited Purpose Only (FRE 105)
IER	Inadmissible expert report
UCDR/UCFR	Uncertified domestic or foreign record (FRE 902(11) & 902(12))
32(a)	FRCP 32(a) (does not comply with restrictions on use of depo testimony)
PK	Personal knowledge (FRE 602)
DO	Subject to objection to form of deposition question
701	Opinion testimony by lay witness (FRE 701)
30(b)(6)	Outside the scope of the 30(b)(6) topics

Deposition of Michael Brown September 10, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
11:24-12:5			
12:12-16			
13:4-6			
13:23-14:6			
14:17-19			
15:9-25			
17:5-24			
19:8-10			
19:15			
19:21-20:2			
20:4-6			
20:14-20			
21:2-6			
29:21-24			
30:7-13			
30:20-31:21			
32:1-33:12			
35:15-37:3			
39:21-40:3			
40:11-16			
41:1-42:5			
42:18-21			
43:1-12			
44:9-14			
44:18-19			
45:3-47:18			
49:17-51:7			
52:13-25			
54:21-56:16			
56:20-58:17			

Deposition of Michael Brown September 10, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
59:14-61:4			
62:8-64:22			
64:25-65:21			
65:25-66:13			
67:1-8			
69:19-23			
72:11-18			
72:22-73:13			
75:3-16			
76:2-9			
76:15-77:6			
77:16-78:2			
78:14-20			
78:22-79:3			

Deposition of Timothy Scott Clark September 8, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
11:9-11:15			
11:21-11:24			
17:7-17:12			
17:14-17:14			
17:16-17:18			
21:7-23:11			
24:16-26:22			
26:25-27:11			
28:20-28:25			
29:22-30:3			
31:11-31:23			
32:2-32:2			
32:7-32:7			
32:9-32:18			
33:7-34:23			
37:2-37:25			
38:5-38:13			
41:1-41:7			
41:12-44:13			
45:11-46:5			
49:5-49:7			
49:18-49:24			
50:21-52:8			
52:22-52:24			
56:15-57:8			
67:22-67:23			
67:25-69:13			
69:24-70:23			
71:3-74:6			
75:25-76:16			

Deposition of Timothy Scott Clark September 8, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
76:19-77:14			
79:20-81:11			
83:2-84:6			
86:10-86:17			
87:3-88:2			
88:6-89:24			
101:14-101:20			
102:7-102:15			
106:22-106:23			
107:2-107:11			
107:18-107:24			
109:5-109:13			
115:20-116:3			
118:17-118:23			
119:2-121:16			
121:18-122:11			
123:10-124:25			
125:3-125:4			
125:6-126:25			
128:8-129:2			
129:7-133:1			
135:11-136:11			
136:19-137:15			
138:6-140:7			

Deposition of Adam Grant September 10, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
12:22-13:4			
13:7-13:12			
13:18-13:21			
15:13-15:20			
16:8-16:10			
17:8-17:16			
17:22-17:23			
18:3-18:22			
19:12-20:5			
20:20-22:21			
24:14-24:20			
24:25-25:16			
25:21-26:2			
26:8-27:16			
27:19-30:4			
30:8-31:25			
32:10-33:6			
33:14-34:15			
34:21-35:25			
36:4-36:15			
36:21-39:8			
39:11-39:21			
40:1-40:21			
40:23-40:25			
41:4-43:12			
43:15-43:25			
44:5-44:25			
45:13-47:8			
47:11-48:14			
48:18-48:20			

Deposition of Adam Grant September 10, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
48:24-51:13			
51:18-51:25			
52:5-53:10			
53:23-54:4			
54:7-54:14			
54:17-56:4			
56:6-57:3			
57:9-57:25			
73:10-74:19			

Deposition of Deponent Shayan Habib May 14, 2020			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
16:7-9			
16:25-17:4			
17:9-18			
18:2-4			
18:8-10			
24:3-5			
25:5-26:4			
29:21-22			
40:2-19			
53:2-7			
55:2-6			
55:25-56:8			
59:19-60:18			
79:19-24			
80:5-21			
84:12-19			
87:3-20			
88:24-89:1			
89:3-20			
91:16-92:1			
98:9-99:16			
100:1-18			
112:18-113:9			
114:15-115:14			
115:18-25			
123:14-25			
147:5-149:17			
150:3-13			
151:4-153:7			
154:10-13			

Deposition of Deponent Shayan Habib May 14, 2020			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
157:19-22			
158:5-7			
158:14-159:1			
159:12-19			
159:24-160:15			
160:23-23			
160:25-161:2			
161:4-22			
161:24-162:8			
162:10-12			
162:14-25			
163:2-2			
163:4-9			
163:11-17			
163:19-164:1			
170:21-25			
173:3-3			
173:5-7			
173:16-20			
174:2-176:20			
177:8-14			
177:24-178:3			
184:10-16			
187:7-9			
188:3-5			
188:14-16			
197:6-25			
198:2-10			
198:12-200:10			
216:10-11			

Deposition of Deponent Shayan Habib May 14, 2020			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
216:13-218:17			
218:19-219:1			
219:3-4			
219:7-14			
219:16-19			
222:3-18			
230:6-231:3			
232:19-21			
269:15-21			
270:6-14			
293:25-294:5			
294:12-14			
294:16-296:3			
296:6-25			
306:20-307:3			
308:25-309:2			
309:4-13			
309:15-310:2			
312:8-313:8			
313:11-18			
313:20-314:1			

Deposition of Shayan Habib June 19, 2020			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
325:8-11			
337:3-12			

Deposition of Shayan Habib September 15, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
17:3-17:4			
17:6-17:8			
18:12-18:18			
19:10-19:15			
19:23-20:20			
23:6-23:23			
37:3-37:17			
37:19-37:21			
41:22-41:24			
42:2-42:14			
43:21-44:11			
44:14-44:18			
45:6-45:6			
45:8-45:25			
46:15-46:19			
60:19-61:2			
83:22-83:24			
85:24-85:25			
86:2-86:7			
103:3-103:19			
103:21-104:5			
104:11-105:21			
105:23-106:11			
108:2-108:6			
109:2-109:18			
109:20-110:3			
110:5-110:6			
110:8-110:14			
110:16-111:5			
111:7-111:19			

Deposition of Shayan Habib September 15, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
111:22-112:2			
113:2-113:19			
114:1-114:5			
114:17-114:21			
115:15-115:18			
115:20-116:8			
116:17-117:2			
143:18-143:18			
143:20-145:14			
145:17-145:17			
145:19-145:23			
148:22-148:22			
150:2-150:19			
150:21-150:24			
151:2-151:18			
151:23-152:19			
152:23-152:23			
152:25-156:25			
157:2-157:18			
157:25-158:11			
158:21-158:21			
158:24-159:11			
161:13-161:25			
162:18-163:6			
163:11-164:7			
165:2-166:7			
166:20-167:9			
174:9-175:9			
176:16-176:16			
177:21-178:14			

Deposition of Shayan Habib September 15, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
180:7-181:6			
181:23-181:25			
182:3-182:4			
182:6-182:6			
183:6-183:6			
183:8-185:7			
185:9-185:14			
185:16-185:19			
185:21-186:5			
186:7-186:9			
186:11-186:12			
186:14-186:20			
186:22-187:13			
187:16-187:19			
187:22-187:24			
189:16-191:11			
193:25-194:11			
196:22-196:22			
199:13-199:15			
200:2-200:5			
202:11-204:25			
205:3-205:23			
226:24-226:24			
231:19-231:24			
236:13-236:19			
236:22-237:3			
237:6-237:6			
237:8-237:20			
237:24-237:25			
238:2-238:10			

Deposition of Shayan Habib September 15, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
238:12-238:13			
238:15-238:23			
251:8-251:8			
251:21-251:24			
254:5-254:21			
254:23-254:25			
255:2-255:6			
255:8-255:10			
255:13-255:21			
256:10-256:21			
257:2-257:8			
258:20-258:22			
258:24-259:7			
259:9-259:17			
259:19-260:3			
260:6-261:1			
261:3-263:6			
263:8-264:15			
264:17-264:23			
264:25-265:8			
265:10-265:14			
265:16-266:10			
266:12-266:23			
266:25-267:3			
267:12-267:18			
267:23-268:3			
268:6-268:6			
271:20-272:18			
272:23-273:13			
273:15-273:16			

Deposition of Shayan Habib September 15, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
273:25-274:18			
274:20-274:24			
281:9-282:1			
282:7-283:2			
283:7-283:13			
283:15-284:7			
284:9-284:9			
284:11-284:20			
284:23-284:23			
285:2-285:5			
287:17-287:24			
288:1-288:12			
288:18-288:20			
288:22-288:24			
289:1-289:8			
289:10-289:19			
289:25-290:8			
290:10-290:19			
290:24-291:23			
291:25-292:2			
292:4-293:1			
294:8-294:9			
294:12-294:17			
294:20-294:21			
294:23-295:9			
295:11-295:12			
295:14-295:22			
296:1-296:20			
297:5-297:19			
297:22-297:25			

Deposition of Shayan Habib September 15, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
298:2-298:7			
298:9-298:10			
298:12-298:13			
298:15-298:19			
298:21-298:25			
301:10-301:12			
301:15-301:23			
301:25-302:11			

Deposition of Shayan Habib September 16, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
321:17-321:19			
321:25-322:19			
322:21-323:1			
323:3-323:5			
323:7-323:9			
323:11-323:12			
323:14-323:19			
325:17-325:23			
326:21-327:2			
327:18-329:2			
329:19-329:21			
329:23-330:1			
330:6-330:16			
330:19-330:23			
331:3-332:7			
332:12-332:15			
332:17-332:20			
332:22-333:1			
333:19-333:24			
337:8-337:24			
338:2-338:6			
338:9-338:9			
338:12-338:19			
339:11-340:2			
341:12-341:23			
341:25-342:3			
342:5-342:12			
342:14-342:17			
342:19-343:2			
343:4-343:11			

Deposition of Shayan Habib September 16, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
343:13-343:19			
343:21-344:9			
344:22-344:23			
344:25-345:2			
345:4-346:23			
347:1-347:1			
347:3-347:7			
347:12-348:8			
348:10-349:5			
349:8-349:8			
349:12-350:2			
350:4-351:1			
351:3-351:3			
351:5-353:11			
353:13-357:20			
357:25-358:11			
358:13-358:19			
359:11-360:7			
360:12-361:4			
361:7-361:10			
361:25-362:2			
362:8-362:15			
362:17-362:22			
362:25-363:1			
363:3-363:6			
363:8-363:13			
363:15-364:14			
364:18-365:4			
365:6-366:7			
366:22-367:11			

Deposition of Shayan Habib September 16, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
367:13-367:25			
368:2-368:3			
368:5-368:15			
380:14-380:23			
380:25-381:1			
381:10-381:12			
384:17-384:18			
386:25-387:10			
415:18-415:18			
417:1-418:3			
422:17-422:17			
424:22-425:15			
425:17-425:18			
425:20-426:24			

Deposition of Scott Hublou April 17, 2020			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
10:12-10:20		35:1-35:6	LF, PK
11:22-12:8		42:2-42:13	R, C, 403
16:9-16:13		46:22-48:22	R, 403
16:17-17:2		49:25-50:20	R, 403
17:18-17:23		51:10-51:24	R, 403
18:6-19:18		52:23-53:19	R, 403
20:3-21:8		55:9-56:5	R, 403, LF, PK
21:13-25:9		56:10-57:9	R, 403, H
26:15-28:13		60:4-63:3	R, 403, LF, PK, H
29:20-34:25		65:1-65:13	R, 403, MIL/Daubert
35:7-42:1		68:21-69:25	R, 403, MIL/Daubert
45:21-46:21		71:20-74:6	R, 403, PK, MIL/Daubert
48:23-49:24		79:1-79:17	R, 403, MIL/Daubert
50:21-51:9		84:4-86:24	R, 403, LF, PK, H, MIL/Daubert
53:20-55:8		88:5-88:9	R, 403, LF, PK
56:6-56:9		88:19-89:1	R, 403, LF, PK
57:10-57:21		97:5-98:9	R, 403, LF, PK, H
71:2-71:19		100:7-102:2	R, 403, LF, PK, H
78:14-78:25		106:1-106:16	R, 403, LF, PK
79:18-80:10		108:12-111:2	R, 403, LF, PK, H
83:22-84:3		117:21-120:23	R, 403
86:25-88:4		126:1-127:6	R, 403, LF, PK, C, H
88:10-88:18		129:22-131:2	R, 403, LF, PK, H
89:2-89:9		142:6-142:24	R, 403, LF, PK, H
99:21-100:6		162:4-162:13	403
105:12-105:25		166:11-166:20	R, 403
106:19-108:11		171:12-171:22	R, 403
127:7-127:14		186:6-186:11	R, 403
128:1-128:2		186:15-187:13	R, 403
128:7-128:8		217:18-219:11	R, 403

Deposition of Scott Hublou April 17, 2020			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
128:11-128:14		220:11-223:17	R, 403
128:19-128:22		230:5-230:11	R, 403, PK, LF
129:3-129:21		244:12-245:22	R, 403, PK, LF
146:15-146:20		245:25-246:7	R, 403
148:21-150:8		249:10-249:25	R, 403, H
162:1-162:3		250:4-250:9	R, 403
166:1-166:10			
166:21-166:24			
171:3-171:11			
186:12-186:14			
219:12-220:10			
223:18-223:21			
226:20-227:14			
231:13-234:24			
244:7-244:11			
245:23-245:24			
246:8-246:19			
250:10-250:23			

Deposition of Scott Hublou August 10, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
9:8-9:13		18:7-18:8	R, 403
9:18-9:20		19:20-20:11	R, 403, H
10:23-11:1		24:22-25:2	R, 403, LF, PK
13:4-13:5		56:1-56:17	R, 403, 701
13:8-13:17		87:2-87:4	R, 403
14:1-14:4		87:15-88:14	403
16:15-17:5		88:21-89:17	403
18:4-18:6		101:12-101:13	R, 403
18:9-19:19		102:16-103:1	R, 403
20:12-21:7		106:22-106:25	
22:7-22:9		118:11-118:15	403
24:2-24:21		120:20-120:20	R, 403
25:3-25:8		122:18-122:19	R, 403
25:17-26:14		124:6-124:9	R, 403, LF, PK
29:3-29:6		126:13-126:14	
55:3-55:25		126:23-127:19	
56:18-58:10		127:25-128:10	R, 403, MIL/Daubert
86:21-87:1		128:15-128:18	403
87:5-87:14		128:22-128:22	R, 403
88:15-88:20		129:7-129:14	R, 403
89:18-90:8		130:22-130:22	R, 403
100:23-101:11		141:2-141:7	R, 403
101:14-101:18		141:12-141:20	R, 403, C
101:20-102:15		147:14-147:14	R, 403
103:2-103:15		143:12-154:1	R, 403, 701
104:4-104:7		154:19-163:1	R, DO, LF, PK, H, 403, 701
105:12-105:19		163:8-164:1	R, LF, PK, 403
106:5-106:21		164:23-171:21	R, LF, PK, H, 403, DO, MIL/Daubert
118:9-118:10		172:22-173:7	R, LF, PK, 403, MIL/Daubert
118:16-120:19		175:9-175:13	R, 403

Deposition of Scott Hublou August 10, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
120:21-120:21		175:23-176:11	R, 403, DO
122:20-124:1		177:23-180:10	R, C, 403, H, DO, 701
124:3-124:5		181:8-184:9	R, 701, 403
124:10-124:14		185:3-189:3	R, LF, 403, 701, MIL/Daubert
124:17-125:20		192:10-195:11	R, LF, 403, 701, MIL/Daubert
126:15-126:22		196:5-197:25	R, LF, 403, 701, MIL/Daubert, H
127:20-127:24		198:17-199:10	R, LF, 403, 701, MIL/Daubert
128:11-128:14			
128:19-128:21			
128:23-128:24			
129:2-129:6			
129:15-130:21			
130:23-131:3			
131:5-131:17			
133:8-133:16			
136:1-136:16			
137:19-138:1			
139:11-141:1			
141:8-141:11			
141:23-141:25			
147:5-147:13			
147:15-148:15			
148:17-148:23			
153:7-153:11			
163:2-163:7			
164:2-164:22			
171:22-172:21			
173:8-174:22			
176:12-176:16			
177:14-177:22			

Deposition of Scott Hublou August 10, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
180:11-180:25			
189:15-192:9			
202:11-202:18			

Deposition of Glen Yankit Kuo May 15, 2020				
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections	Google's Counter-Counter-Designations
14:8-14:11		17:10-17:17		
15:1-15:3		18:6-18:6		
15:24-17:8		18:23-18:23		
17:24-18:5		30:15-30:15		
18:9-18:21		41:7-41:14		
19:1-19:4		42:18-42:19		
20:13-20:18		43:21-43:21		
29:23-30:11		44:5-44:5		
31:2-33:2		56:24-57:1		
34:24-35:19		57:14-57:15		
40:17-40:20		58:9-58:12		
40:24-41:5		68:7-69:3		
41:25-42:17		70:1-70:3		
42:20-42:21		71:11-72:2	C	72:3-72:17
43:19-43:20		83:19-83:19		
43:22-44:4		98:25-99:6		
58:20-59:2		132:9-132:11	C	132:12-132:17
60:23-62:3		132:18-133:4	C	132:12-132:17
64:10-65:12		136:14-136:16		
74:10-78:14		136:18-137:12		
80:22-83:18		138:1-138:10	C	138:11-138:22
83:20-84:2		139:20-139:22	C	139:23-140:1
84:4-84:16		156:16-156:16		
86:5-86:19		167:10-167:10		
100:10-104:6		215:10-215:12		
105:17-106:16		223:6-223:13		
116:25-118:19		228:25-229:2	C, DO	229:3-229:3
119:15-121:1		229:4-229:6	C, DO	229:3-229:3
148:2-151:12		256:11-256:17		
154:1-156:15		261:14-261:21		
156:17-157:11		262:13-262:14		
164:23-167:9				
167:11-167:16				
170:18-171:7				
180:18-181:19				
181:21-184:24				
194:1-198:22				

Deposition of Glen Yankit Kuo May 15, 2020				
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections	Google's Counter-Counter- Designations
199:24-200:9				
201:8-202:14				
206:8-207:4				
211:12-212:24				
239:2-242:21				
243:18-247:7				
247:11-248:7				
248:12-248:20				
249:2-249:4				
249:8-250:18				
250:24-251:16				

Deposition of Glen Okita May 20, 2020			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
11:6-11		29:18-30:21	R, 403, MIL/Daubert
11:16-20		37:14-38:14	R, 403, PK, MIL/Daubert
25:9-27:25		43:10-45:25	R, 403, PK, LF, MIL/Daubert
28:4-14		46:13-46:14	R, 403
28:19-25		46:17-46:19	R, 403
29:9-17		65:25-66:17	R, 403
30:22-31:12		70:10-70:20	R, 403
33:14-16		74:21-75:5	R, 403, MIL/Daubert
33:24-34:8		125:13-126:13	R, 403, MIL/Daubert
36:10-37:2		127:16-127:19	R, 403, MIL/Daubert
37:5-8		161:2-161:7	R, 403, MIL/Daubert
38:15-39:11		166:2-166:16	R, 403, MIL/Daubert
39:24-40:9		172:14-173:1	R, 403, MIL/Daubert, PK
41:6-11		173:24-175:15	R, 403, MIL/Daubert, PK
41:16-20		181:2-182:12	R, 403, MIL/Daubert
41:24-42:15		186:5-186:24	R, 403, MIL/Daubert
46:1-10		236:22-237:16	R, 403, MIL/Daubert
48:12-23		237:24-239:4	R, 403, MIL/Daubert
52:16-54:21		246:4-247:13	R, 403, MIL/Daubert
58:25-59:6			
60:24-61:9			
61:11-62:14			
62:21-64:1			
64:10-65:24			
70:4-9			
70:21-25			
75:10-81:2			
81:9-82:24			
85:12-86:3			
86:8-10			

Deposition of Glen Okita May 20, 2020			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
86:12-15			
86:17-24			
112:18-22			
116:4-122:6			
123:11-124:17			
125:4-12			
126:14-127:15			
128:2-18			
134:14-15			
134:17-23			
135:5-139:11			
140:12-25			
150:5-151:2			
151:13-152:3			
159:10-160:16			
161:22-162:18			
168:13-169:3			
170:15-171:10			
172:8-13			
173:2-23			
179:6-16			
190:17-191:24			
192:2-11			
198:6-22			
199:1-13			
202:15-18			
233:7-20			
236:3-21			
237:17-23			
244:2-20			

Deposition of Glen Okita September 1, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
11:2-11:7		39:25-40:13	R, 403
11:14-11:16		56:5-58:1	R, 403, MIL/Daubert
23:23-23:24		61:24-64:3	R, 403, MIL/Daubert
24:4-25:4		70:16-73:6	R, 403, MIL/Daubert, PK
25:11-26:12		73:12-73:24	R, 403, MIL/Daubert
38:23-38:24		87:3-88:2	R, 403, MIL/Daubert
39:2-39:24		141:3-141:7	R, 403, MIL/Daubert
40:21-41:2		194:19-194:20	R, 403
41:18-41:22		195:6-195:16	R, 403, MIL/Daubert, PK
58:1-59:6		202:5-205:13	R, 403, MIL/Daubert, LF, PK
65:20-65:25		222:24-223:17	R, 403, MIL/Daubert, LF, PK
70:6-70:15		232:18-232:24	R, 403, LF, PK
73:7-73:11		244:25-245:11	R, 403, MIL/Daubert
73:25-74:4		245:22-245:24	R, 403, MIL/Daubert
81:15-81:22		246:1-246:2	R, 403, MIL/Daubert
82:13-86:17		253:18-253:21	R, 403, MIL/Daubert
88:3-89:10		255:15-255:22	R, 403, LF, PK
140:12-141:2		291:6-291:16	R, 403
141:8-141:23		292:13-292:14	R, 403, MIL/Daubert
145:15-146:25			
174:25-175:13			
176:5-176:13			
187:9-189:21			
194:11-194:18			
194:21-195:5			
205:15-206:7			
223:18-225:11			
225:20-229:6			
230:18-231:5			
231:7-232:17			

Deposition of Glen Okita September 1, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
233:2-234:19			
237:5-237:24			
238:8-241:24			
242:3-242:4			
242:6-242:24			
243:3-243:25			
244:5-244:24			
246:14-250:1			
250:17-250:24			
253:1-253:15			
260:13-260:14			
261:6-261:11			
266:8-266:17			
267:6-268:2			
291:17-292:12			
294:6-295:8			

Deposition of Gianna Conci Orozco December 9, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
12:14-12:19		14:21-14:24	R, 403
12:24-13:4		15:7-15:21	R, 403
13:21-14:7		37:19-38:5	
24:14-24:16		75:21-75:22	R
26:12-26:19		76:17-76:17	R
33:17-34:8		90:1-90:4	R
34:24-34:25		121:7-121:7	R
35:2-35:13		136:9-136:16	R
35:23-36:4			
36:25-37:10			
40:22-40:25			
41:7-41:21			
42:2-43:9			
43:15-43:22			
45:3-45:20			
46:9-47:2			
47:13-47:14			
47:21-47:25			
48:2-48:4			
50:15-50:25			
52:1-52:2			
52:9-53:2			
53:5-54:3			
54:14-54:17			
54:22-54:24			
55:16-55:18			
56:9-60:9			
61:5-64:23			
65:2-66:3			
70:15-73:22			

Deposition of Gianna Conci Orozco December 9, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
74:4-74:8			
74:13-74:14			
74:16-75:20			
75:25-76:9			
76:14-76:16			
76:18-76:18			
76:20-76:22			
90:20-91:1			
91:5-97:13			
97:22-97:22			
97:24-98:4			
98:10-98:16			
100:17-100:22			
101:2-101:9			
102:18-102:19			
103:2-103:10			
103:17-103:23			
108:10-111:1			
111:4-111:5			
111:7-111:10			
111:14-111:21			
113:18-113:19			
113:21-113:23			
114:12-114:22			
115:4-116:10			
116:12-116:14			
116:19-116:21			
118:3-121:6			
121:8-122:1			
122:11-123:25			

Deposition of Gianna Conci Orozco December 9, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
124:18-127:2			
132:11-133:25			
134:6-134:25			
135:21-136:4			
136:17-138:14			
139:2-139:25			
142:21-143:17			

Deposition of William Yu October 4, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
11:10-11:21		9:5-9:7	R, 403, Daubert/MIL
12:2-12:5		10:16-10:23	R, 403, Daubert/MIL
13:4-13:6		44:2-44:6	R
13:13-13:18		45:2-45:12	
15:1-15:16		50:8-50:17	PK
16:1-16:13		52:1-52:8	PK, LF
16:20-16:25		56:18-56:24	
17:6-18:18			
19:3-20:20			
20:25-22:12			
22:18-23:11			
23:15-23:18			
24:3-24:13			
24:18-25:1			
25:3-25:8			
25:15-25:16			
25:19-26:20			
27:3-28:17			
28:24-29:12			
30:1-31:11			
31:16-32:4			
32:7-32:9			
32:21-32:25			
33:3-33:6			
33:9-33:13			
36:16-37:15			
38:1-38:17			
38:24-41:2			
41:5-41:9			
41:12-43:15			

Deposition of William Yu October 4, 2021			
Google Designations	EcoFactor Objections	EcoFactor Counter-Designations	Google Objections
43:23-44:1			
44:7-45:1			
45:13-45:23			
45:25-46:4			
46:8-49:10			
49:19-49:23			
50:2-50:7			
50:18-51:18			
52:9-53:1			
53:4-53:22			
53:25-55:21			
55:23-56:17			
56:25-57:25			
58:7-58:11			
58:15-59:24			
60:10-61:25			
62:21-63:20			
63:22-64:1			
64:7-65:8			